



IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

*Alexandria Division*

UNITED STATES OF AMERICA

v.

ANTHONY AYEAH,

*Defendant.*

Case No. 1:21-cr-242-CMH

**STATEMENT OF FACTS**

The United States and the Defendant, ANTHONY AYEAH, stipulate that the allegations in the one-count Criminal Information are true and correct. The United States and Defendant further stipulate that had the matter gone to trial, the United States would have proven the allegations in the Criminal Information and the following facts beyond a reasonable doubt through admissible and credible evidence.

1. From on or about March 23, 2018 to on or about July 8, 2019, in the Eastern District of Virginia and elsewhere, defendant ANTHONY AYEAH knowingly and intentionally conspired and agreed with Mouaaz Elkhebri, Onyewuchi Ibeh, Jason Joyner and others, known and unknown, to knowingly engage in monetary transactions through a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000 that was derived from specified unlawful activity—namely, wire fraud in violation of Title 18, United States Code, Section 1343—in violation of Title 18, United States Code, Sections 1956(h) and 1957.

2. It was the object of the conspiracy for Defendant and his coconspirators to launder the proceeds of wire fraud through monetary transactions.

3. To achieve the object of the conspiracy, Defendant and his coconspirators engaged in the following conduct in the Eastern District of Virginia and elsewhere:

The Specified Unlawful Activity: Wire Fraud

4. Unknown conspirators targeted several businesses in various industries (hereinafter referred to as the “victim businesses”). The unknown conspirators gained access to the victim businesses’ computer networks, including their email servers and email accounts, through phishing attacks or the use of malware. Once the unknown conspirators had access to the victim businesses’ email accounts, the unknown conspirators identified the employees of the victim businesses responsible for paying the companies’ bills and other financial obligations (hereinafter referred to as the “victim employee”).

5. The unknown conspirators then identified a company or other entity to which the victim businesses owed money (hereinafter referred to as the “business partner”). The unknown conspirators then contacted the victim employee by email, falsely claimed to be the business partner, told the victim employee that the business partner’s bank account information had changed, and instructed the victim business to wire the money it owed to the business partner to a new bank account. The unknown conspirators then gave the victim employee the bank routing number and account number to an account controlled by the conspirators and opened for the purpose of facilitating the fraudulent scheme. Then, the victim employee—believing they were wiring money to the actual business partner—wired money to an account controlled by the conspirators.

6. In so doing, the conspirators devised and intended to devise a scheme and artifice to defraud the victim businesses, and obtained money and property from the victim businesses by means of false and fraudulent pretenses, representations, and promises, and transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, any

writings, signs, signals, pictures, and sounds for the purpose of executing the scheme and artifice to defraud.

The Money Laundering Conspiracy

7. Defendant's role in the conspiracy was to: (a) open bank accounts in his name that other coconspirators, including Ibeh, used to launder the proceeds of the wire fraud scheme; and (b) conduct cash transactions with the proceeds of the fraud. Defendant played no role in the underlying wire fraud conspiracy.

8. On March 23, 2018, Defendant opened an account ending in -4059 at Bank of America (the "BOA-4059 account") in the name of "Anthony Dubila Ayeah Sole Prop d/b/a Ayeah Production." The BOA-4059 account, which Ibeh and Defendant regularly accessed, was opened at a Bank of America branch located in the Eastern District of Virginia. Ibeh and Defendant used the BOA-4059 account to launder the proceeds of the wire fraud scheme.

9. The proceeds from the wire fraud scheme described above were ultimately transferred to the BOA-4059 account. Throughout the course of the conspiracy, the BOA-4059 account received at least \$635,000 from at least four victims.

10. Ibeh then used the BOA-4059 account to wire the proceeds of the fraudulent scheme to other coconspirators and otherwise spend the funds. While Ibeh kept the majority of the profits, Defendant was paid for his role in the conspiracy.

11. On or about September 12, 2019, Defendant, at Ibeh's direction, deposited \$20,000 of U.S. currency into the BOA-4059 account. This money was derived from a specified unlawful activity, that is the proceeds of the wire fraud scheme described above.

12. The actions of Defendant, as recounted above, were in all respects knowing, willful and deliberate, and were not committed by mistake, accident, or other innocent reason.

13. This Statement of Facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

Respectfully submitted,

Jessica D. Aber  
United States Attorney

Date: 11/16/2021

By: CH  
Christopher J. Hood  
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, ANTHONY AYEAH, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

  
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Anthony Ayeah

I am Drewry Hutcheson, Defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

  
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Drewry B. Hutcheson  
Attorney for Anthony Ayeah